

AB:ALK

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a)
and 960)

VERNON GENE NEWTON,

Case No. 20-164 M

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

RYAN W. SHIPLEY, being duly sworn, deposes and states that he is a Special Agent with the Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

On or about February 16, 2020, within the Eastern District of New York and elsewhere, the defendant VERNON GENE NEWTON did knowingly, intentionally and unlawfully import into the United States from a place outside thereof, cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and the grounds for his beliefs are as follows:¹

1. On or about February 16, 2020, the defendant VERNON GENE NEWTON arrived at John F. Kennedy International Airport ("JFK") in Queens, New York aboard Delta Airlines Flight 472, from Sao Paulo, Brazil.

2. At JFK, U.S. Customs and Border Protection ("CBP") selected NEWTON for inspection.

3. NEWTON was traveling with two checked bags—a purple Santino suitcase and a brown Tumi suitcase—and one carry-on bag—a black Tumi suitcase. NEWTON confirmed his ownership of all three bags.

4. CBP Officers escorted NEWTON to a private search room in order to conduct a baggage inspection. During the inspection, a CBP Officer noticed that the bottom of the purple Santino suitcase felt unusually heavy after the suitcase's contents were removed. Further inspection of the bag with a probe revealed a white powdery substance. The white powdery substance subsequently field-tested positive for cocaine.

5. CBP Officers then placed NEWTON under arrest.

6. In total gross weight, law enforcement recovered approximately 1.31 kilograms of cocaine.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that the defendant
NEWTON be dealt with according to law.

S/ Ryan Shipley

Ryan W. Shipley
Special Agent
Homeland Security Investigations

Sworn to me before this
18th day of February, 2020

S/ Vera Scanlon

THE HONORABLE VERA M. SCANLON
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK